

FILED
IN CLERKS OFFICE
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
2004 OCT 25 P 2:38

ST. PAUL TRAVELERS, as successor
in interest to ATLANTIC MUTUAL
INSURANCE CO. Marine Division,
subrogee of IBEX LLC, and IBEX, LLC,

U.S. DISTRICT COURT
DISTRICT OF MASS.
Civil Action No.
04-11314-PBS

PlaintiffS,

v.

FAIRHAVEN SHIPYARD, INC., and
A.I. MARINE ADJUSTERS, INC.,
a member of AMERICAN INTERNATIONAL
GROUP, INC.,

Defendants.

**DEFENDANT, FAIRHAVEN SHIPYARD, INC.'S, RULE 26(a)(1)
AND LOCAL RULE 26.2(A) INITIAL DISCLOSURES**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and U.S. District Court Local Rule 26.2(A), Defendant, FAIRHAVEN SHIPYARD, INC., makes the following initial disclosures:

A. Individuals likely to have Discoverable Information:

Subject Matter

The following employees worked on the "IBEX" each having a work schedule Monday through Friday from 7:30 a.m. to 4:00 p.m.

1. Armand Deslauriers, Welding Foreman
93 Peckham Rd., Acushnet, MA 02743
2. Jeffrey Lech, Welder
52 Keaksarge St., New Bedford, MA 02745
3. Randy Isherwood, Welder
P.O. Box 9424, Fall River, MA 02720

4. Gilbert Mendes, Welder
292 Mill Rd., Fairhaven, MA 02719
5. Phil Majndle, Welder
6 Robinson Rd., Rochester, MA 02770
6. Tony Eleniefsky, Fiberglass Repair
6A Crandon Rd., Acusimet, MA 02743
7. Humberto Veira, Paint Sprayer
444 Hawes St., New Bedford, MA 02745
8. Ron Fortier, Project Manager
837 Pine Hill Dr., New Bedford, MA 02745
9. Roger Judge, Owner/President
38 Fort St., Fairhaven, MA 02719
10. Richard Minor, Surveyor (represented Hull
Underwriters at time of incident alleged,
not an employee of Fairhaven Shipyard, Inc.)
SGS Marine Services
175 Paramount Drive, Raynham, MA 02767
11. Craig Marx, Yard Manager
63 Laurel St., Fairhaven, MA 02719

B. Documents that are in the Possession, Custody, or
Control of FAIRHAVEN SHIPYARD, INC. and that it May
Use to Support its Claims or Defenses

1. Fairhaven Shipyard, Inc.'s Work Order No. 501128
detailing all of the repairs made to the M/V
IBEX.

C. Computation of Damages

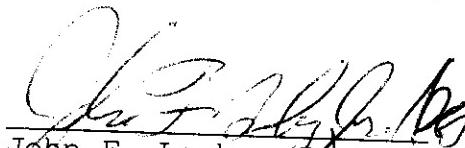
Not applicable.

D. Insurance Agreements

1. Attached is a copy of the New Hampshire Insurance Co. insurance declarations page, entitled "Commercial General Liability Declarations" for Policy No. CPP 305-83-44 for policy period 12/15/00 to 12/15/01.

I hereby certify that a true copy of the above document was served upon each attorney of record by mail on October 25th, 2004.

Respectfully submitted,


John F. Leahy, Jr.
Attorney for the Defendant,
FAIRHAVEN SHIPYARD, INC.
Long & Houlden
100 Summer Street, 11 FL
Boston, MA 02110
(617) 439-4777
BBO# 289860

DATE: 10/25/04